# DOW. LOHNES & ALBERTSON, PLLC

LAURA H. PHILLIPS DIRECT DIAL 202-776-2424 lphillips@dlalaw.com WASHINGTON, D.C.

1200 NEW HAMPSHIRE AYENUE, N.W. SUITE 400 - WASHINGTON, D.C. 20034-6802 TELEPHONE 202-776-2066 - FACSIMILE 202-776-2222 ONE RAVINGA DRIVE - SUITE 1400 ATLANTA, GEORGIA 30346-2108 TELEPHONE 770-901-8800 FACEIMILE 770-901-8874

March 11, 2002

## **VIA FACSIMILE**

Sasan Kimmel, Staff Attorney
Bavid Siehl, Staff Attorney
Federal Communications Commission
Wireless Telecommunications Bureau
Policy Division
445 12th Street, S.W.
Washington, D.C. 20554

Re: Universal 911 Dialing-First Transition Report

Dear Ms. Kimmel and Mr. Siehl:

In accordance with the *Public Notice* released on March 1, 2002, on behalf of Triton PCS Operating L.L.C. ("Triton PCS"), we respectfully submit Triton PCS' initial transition report describing the transition to 911 service in certain counties designated by the *Public Notice* that are areas where Triton currently operates. As Triton PCS does not currently offer service in Alleghany, VA; Dickenson, VA; Lee, VA; or Saluda, SC, the attached report only covers Appornantox County, VA; Taliaferro County, GA; and Warren County, GA.

Please contact the undersigned if any questions arise regarding this filing.

Respectfully submitted,

Laura H. Phillips

Counsel for Triton PCS Operating

Company L.L.C.

Enclosure

<sup>&</sup>lt;sup>1</sup> Carrier Transition Reports for the Implementation of the 911 Abbreviated Dialing Code Pursuant to the Wireless Communications and Public Safety Act of 1999 (911 Act), *Public Notice*, CC Docket No. 92-105, WT Docket No. 66-110, DA 02-507 (rel. March 1, 2002).

D03

Note: This is a sample template, it is not an OMB approved

## Universal 911 Dialing- First Transition Report

Riease read instructions before completing

Section 1

Camer Identification Information

Parent Company Name

Triton PCS Operating Company L L C

Service Provider Name

T術ton PCS d/b/a SunCom

Gempany Address, City, State, Zip

Fation PCS

100 Cassatt Rd

Serwyn PA 19312

Service Provider Type

Wireless

Wireline

Name(s) of Wireless License Holder(s)

Triton PCS License Company

Contact Name

Laura H. Phillips

Contact Tel

292-776-2824

Fax#

202-776-2222

Estall Address

[pallilps@dialaw.com

Section 2

Legal Area 911 Implementation

List all individual local areas covered by this report (e.g., Lee County, Virginia):

Appomattox County, VA Tallaferro County, GA

Warren County, GA

Triton PCS does not currently offer service in Alleghany, VA; Dickenson, VA; Lee, VA; or Saluda, SC.

D04

14:38

For each area listed above, identify the emergency response point	to which 911 calls will be routed
---	-----------------------------------

911 calls in Appomattox County, VA are currently being routed to the State Police (#77) with 434-352-0583.

911 calls in Taliaferro County, GA are currently being routed to the Taliaferro County PSAP with 706-456-2345.

911 calls in Warren County, GA are currently being routed to the Warren County PSAP with 706-465-3003.

(b) For each area fisted above, provide details of the carrier's progress in completing translation and other work necessary to route 911 calls to the lighted emergency response point.

Appomattox County, VA has basic 911 (*i.e.*, all callers are able to reach emergency personnel). When Appomattox County designates a local PSAP, Triton will begin the necessary upgrades to route all calls to the designated PSAP.

Taliaferro County, GA has basic 911. Triton has completed all necessary translation work and currently routes 911 calls to the designated PSAP.

Warren County, GA has basic 911 service. Triton has completed all necessary translation work and currently routes all calls to the designated PSAP.

(c) For each area listed above, provide the date or projected date that transition to the 911 abbreviated dialing code will be completed.

As indicated above, Triton PCS currently delivers 911 calls to either the State Police or the designated PSAP for Appoint County, VA, Taliaferro County and Warren County, GA.

#### Section 3

#### 911 Implementation Problems

(a) Describe any problems the reporting carrier has encountered in identifying 911 number call routing points. Describe any other operational problems carrier has experienced during the initial transition stages.

Triton PCS has had no problems with routing.

(b) Where the reporting carrier has experienced 911 implementation problems, describe any efforts the carrier has made to coordinate with public safety agencies and state and local authorities.

**P**25

Signature  1 contify that I am an authorized representative of the reporting entity. That I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this form are true and accurate statements of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this form are true and accurate statements of the above-named reporting entity, that I have examined the faregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this form are true and that the reporting entity has completed the steps necessary to properly route 911 emergency calls in the localibles covered by the report as of		
	Section 4	
the best of my knowledge, information and bellef, all statements of fact contained in this form are true and accurate statements of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and bellef, all statements of fact contained in this form are true and that the reporting entity has completed the steps necessary to properly route 911 emergency calls in the localities covered by the report as of	Gereificad	ion - To be signed by an authorized representative of the reporting entity
the best of my knowledge, information and belief, all statements of fact contained in this form are true and that the reporting entity has completed the steps necessary to properly rouse 911 emergency calls in the localities covered by the report as of	×	the best of my knowledge, information and belief, all statements of fact contained in this form are true and accurate statements of the
Printed name of authorized representative: Gien Robinson  Titile: Senior Vice President of Engineering  Bake: March 8, 2002  Tiels filling to: Original filling revised filling  Prevised filling  Prevised filling  Prevised filling  Prevised filling		the best of my knowledge, information and belief, all statements of fact contained in this form are true and that the reporting entity has
Printed name of authorized representative: Glen Robinson  Titile: Senior Vice President of Engineering  Bake: March 8, 2002  Tiels filling to: Original filling revised filling  President 1 original filling revised filling		
Printed name of authorized representative: Glen Robinson  Titile: Senior Vice President of Engineering  Bake: March 8, 2002  Tiels filling to: Original filling revised filling  President 1 original filling revised filling		
Title: Senior Vice President of Engineering  Baile: March 8, 2002  Tals fitting ts: original fitting revised filling  PERSONS MAKING WILLFULL FALSE STATEMENTS IN THIS DOCUMENT CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER	Signature	She a Alem
This filling to: Original filling revised filling  PERSONS MAKING WILLFULL FALSE STATEMENTS IN THIS DOCUMENT CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER	Printed na	arme of authorized representative: Gien Robinson
Tals filling to: Original filling revised filling revised filling  PERSONS MAKING WILLFULL FALSE STATEMENTS IN THIS DOCUMENT CAN BE PLINISHED BY FINE OR IMPRISONMENT LINDER	Title: Ser	nior Vice President of Engineering
PERSONS MAKING WILLFULL FALSE STATEMENTS IN THIS DOCUMENT CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER	Date: Ma	arch <b>8</b> , 2002
	Tals filing	ts: Soriginal filing revised filing
		5 MAKING WILLFULL FALSE STATEMENTS IN THIS DOCUMENT CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER 5 OF THE UNITED STATES CODE, 18 U.S.C. §1001.